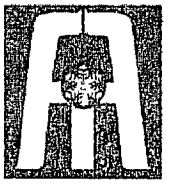
I-139



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Patricia N. Daniels, Director,
Supplemental Food Programs Division, Room 528
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive
Alexandria, Virginia 22302

Re: Docket No. 0584–AD77; WIC Food Packages Proposed Rule (August 7, 2006)

Dear Sir or Madam:

The American Frozen Food Institue appreciates this opportunity to offer comments concerning the pending proposal to revise the Women, Infants and Children (WIC) Program food packages. AFFI is the national trade association representing frozen food manufacturers and their marketers and suppliers. AFFI's more than 500 member companies are responsible for approximately 90 percent of the frozen food processed annually in the United States, valued at more than $60 billion. AFFI members are located throughout the country and are engaged in the manufacture, processing, transportation, distribution and sale of products nationally and internationally.

With the increasing levels of obesity in the U.S., AFFI's member companies have continued to show their commitment to providing healthy choices to Americans, as is apparent in the large number and variety of new health-conscious frozen food products introduced into the market every year. As part of this commitment, AFFI would like to applaud the USDA/FNS for recognizing in the proposal the nutritional importance of fruit and vegetables in the diets of women and children by greatly expanding the variety and amount available to WIC program recipients.

General Comments

While we welcome the addition of fruits and vegetables to the program, we note the substantial changes FNS proposes in food categories already included in the packages. We

urge the agency to proceed cautiously, and to consider carefully all the changes it proposes, to ensure that the program continues to deliver high priority nutrients to WIC participants in a cost effective manner. We recognize that revising the WIC food packages to reflect the recommendations of the *2005 Dietary Guidelines* and current nutrition science may be difficult within the program's existing budget. Should the agency determine that additional funds are necessary, we hope it will not hesitate to ask Congress for the assistance needed to meet WIC's nutritional mission.

Addition of Fruits and Vegetables

Importantly, in allowing the substitution of frozen and other processed fruit and vegetables in place of fresh produce, the proposal recognizes the nutritional equivalence—and in some cases, superiority—of frozen products, as has been demonstrated in numerous studies. Often, fresh produce is held for long periods of time after harvesting, during which there can be significant degradation of nutritional components, especially when improperly stored or handled by the vendor and/or consumer. Frozen produce, on the other hand, is normally quick frozen within hours after harvest, which preserves the nutritional components present in freshly picked produce for longer periods of time, with a much slower rate of degradation. It is important that the language in the preamble, and throughout the proposal, be consistent with these facts and not promote "fresh" or raw produce over frozen.

Additionally, the proposal falls short of the recommendation by the Institute of Medicine (IOM), which advised that vouchers of $8 and $10 per month for children and women, respectively, should be allocated for the purchase of fruits and vegetables. In the proposed rule, the dollar amounts were cut to $6 and $8 per month. Given the tremendous importance of increasing the consumption of fruits and vegetables, as outlined in the HHS/USDA *2005 Dietary Guidelines for Americans*, and the recommendations of the experts who produced the IOM report, AFFI strongly recommends that USDA fund the fruit and vegetable vouchers at the $8 and $10 levels.

According to the *Dietary Guidelines*, ". . . those who eat more generous amounts [of fruits and vegetables] as part of a healthful diet are likely to have reduced risk of chronic diseases, including stroke and perhaps other cardiovascular diseases, type 2 diabetes, and cancers in certain sites (oral cavity and pharynx, larynx, lung, esophagus, stomach, and colon-rectum). Diets rich in foods containing fiber, such as fruits, vegetables, and whole grains, may reduce the risk of coronary heart disease." The *Guidelines* recommend that, for adults, 4.5 cups (nine servings) of fruits and vegetables be consumed every day, at the 2,000 calorie daily intake level. The IOM recommendation, at the $10 level, would only provide up to 1.7 cups — less than half the recommended level. A decrease in voucher levels to $8 for women would reduce the daily allowance to 1.36 cups — less than a third of the recommended daily intake.

It is clear, therefore, that USDA should re-evaluate its proposed voucher levels and take all necessary steps to ensure there is adequate funding available to support the full recommendation of IOM, at the very least.

AFFI greatly appreciates the opportunity to comment on the proposed rule as it is a tremendous step forward for the WIC program and we will gladly be available to provide additional input, if requested.

Sincerely,

Leslie G. Sarasin, Esq., CAE
President and Chief Executive Officer

From: Catherine Crawford [cdfu@ak.net]
Sent: Monday, November 06, 2006 2:20 PM
To: WICHQ-SFPD
Subject: Docket 0584-AD77 WIC Food Package Rule

I-140

Cordova District Fishermen United
P.O. Box 939 | Cordova AK 99574
Ph: (907) 424 3447 Fax: (907) 424 3430
Email: cdfu@ak.net Website: www.crsalmon.org

November 04, 2006

Patricia N. Daniels, Director
Supplemental Food Programs Division
Food and Nutrition Service
United States Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria VA 22302

Re: Docket ID Number 0584-AD77, Women, Infants and Children Food Package Rule

Dear Ms. Daniels,

Cordova District Fishermen United (CDFU) represent the interests of more than 800 fishing families in the Copper River / Prince William Sound fisheries. Alaska salmon is a healthful resource that we harvest with care and market with pride.

CDFU supports the inclusion of canned Alaska salmon in the proposed Women, Infants and Children food package III and VII for breastfeeding women. We also support the inclusion of canned salmon for all the target groups under WIC Food Packages III and IV, V, and VI. Canned salmon is an excellent source of protein, calcium, selenium, niacin and vitamins B-6, B-12, and D. Salmon is high in essential Omega 3 oils, and is low in saturated fat.

Medical studies have proven the nutritive value of canned salmon for women during pregnancy, and its benefits for the cognitive and neurological development in infants, and pre-school age children. The USDA WIC program will be greatly enhanced with the inclusion of canned salmon, and will ensure that all target groups have optimal access to this quality food product.

Sincerely,

Catherine Crawford
Executive Director.

DEL MONTE FOODS

One Market @ The Landmark
P.O Box 193575
San Francisco, CA 94119-3575
415-247-3400

I - 141

November 6, 2006

Patricia Daniels
Director, Supplemental Food Programs Division
Food and Nutrition Service, U.S. Department of Agriculture
3101 Park Center Drive, Room 528
Alexandria, VA 22302

RE: Docket ID Number 0584-AD77, WIC Food Packages Proposed Rule

Dear Ms. Daniels:

I am writing in response to the Proposed Rule regarding revisions to the WIC food packages. I am the Nutritionist for Del Monte Foods, Inc. We commend USDA for proposing important changes to ensure that WIC participants are provided a wide choice of fruits and vegetables – in all forms – fresh, canned and frozen - as part of the food packages. Since many WIC participants fall short of meeting the recommendations set by the Dietary Guidelines for Americans for fruits and vegetables, consuming only about a third of what is recommended, programs such as WIC must promote maximum flexibility to help participants purchase and consume more fruits and vegetables, in all forms. Allowing canned, frozen and fresh options as part of the food packages is an important step in increasing fruit and vegetable intakes among WIC participants. In addition, as stated in supporting information (enclosed) from the Canned Food Alliance, canned fruits and vegetables are safe, affordable and provide equivalent nutrition to their fresh counterparts and should be included in the WIC food package.

In addition, we applaud the agency for providing WIC moms and children with nutritious lean protein options that include beans and seafood. We do recommend that Albacore tuna also be included in the final package and that both forms of canned tuna be available to women who are partially breastfeeding. Canned light meat and Albacore tuna are both excellent sources of lean protein, B vitamins and Omega-3 Fatty Acids. In addition, these fall in line with the EPA and FDA advisories regarding fish intake and the recent guidance from the Institute of Medicine and National Academy of Sciences, which states that females who are pregnant, may become pregnant or are breastfeeding can consume up to 6 ounces of Albacore Tuna per week. Including both forms of canned tuna will allow women participating in WIC to receive the nutritional benefits of canned tuna.

Del Monte Foods is committed to nourishing families and enriching lives everyday. We look forward to a final rule that offers flexibility and promotes variety both in the types of fruits vegetables and seafood provided as well as the form in which they are provided.

Sincerely,

Laura Molseed, MS, RD, LDN
Nutritionist, Del Monte Foods

Canned Food Alliance

Canned Food.
The Easy Way to Eat Right.

CAN Fit

Canned Fruits and Vegetables Fact Sheet

Convenience Affordability Nutrition

The government's *Dietary Guidelines for Americans 2005* recognize canned foods play a significant role in helping children and their families meet *MyPyramid's* recommendations. The U.S. Department of Agriculture's new food guidance system identifies canned foods as a way to help people consume the recommended daily variety and amount of fruits, vegetables, meats and beans, as well as grains and dairy products. (U.S. Department of Agriculture and the Department of Health and Human Services Dietary Guidelines for Americans 2005, http://www.mypyramid.gov/guidelines/index.html)

Consumers want more choices to help them meet their goals. In research commissioned by the Produce for Better Health Foundation, consumers were relieved to know that canned and frozen fruits and vegetables counted towards helping them meet their dietary goals. (Sterling Brands presentation on PBH Fruits and Veggies More Matters© brand development, Summer 2006)

Increased promotion of nutritious, convenient fruits and vegetables to children was a recommendation of the Joint Workshop of the Federal Trade Commission and the Department of Health and Human Services. In its April 2006 Report: *Perspectives on Marketing, Self-Regulation and Childhood Obesity*, FTC and HHS state that "...processing and packaging technologies are allowing companies to make fruit and vegetables more convenient for consumers." Canned fruits provide a convenient and safe alternative to less nutritious snacks and beverages and are making their way into vending machines, quick-service restaurants and other convenience-oriented venues. (Federal Trade Commission and the Department of Health and Human Services report: *Perspectives on Marketing, Self-Regulation, and Childhood Obesity*, May, 2006. http://www.ftc.gov/os/2006/05/PerspectivesOnMarketingSelf-Regulation&ChildhoodObesityFTCandHHSReportonJointWorkshop.pdf)

The ingredients you choose, not the form of the ingredients, are what really determine a recipe's nutrient content. A three-part study conducted by the University of Massachusetts found that, from a nutrition and sensory standpoint, recipes prepared with canned ingredients and those prepared using cooked fresh and/or frozen ingredients were rated comparably. This research also showed similar nutrient profiles of dishes made from canned, cooked fresh and/or frozen ingredients. (Samonds, K. 2000. Nutrition Study Phase I, Phase II and Phase III. University of Massachusetts)

All forms of fruits and vegetables make a positive contribution to the diet. Studies conducted by the University of Illinois Department of Food Science and Human Nutrition also confirmed that canned foods are comparable to cooked fresh and frozen varieties in their nutrient contribution to the American diet. (Klein, B. and Kaletz, R. 1997. Nutrient conservation in canned, frozen, and fresh foods. University of Illinois)

Fresh does not always mean more nutritious. A recent review of existing research (pending publication) on fresh, frozen and canned fruits and vegetables by the University of California, Davis, reveals that loss of nutrients in fresh products may be more substantial than commonly perceived: storage and cooking can lead to overall losses of up to half prior to consumption. (Davis, Rickman, J., Barrett, D. and Bruhn, C. 2006. Nutritional comparison of fresh, frozen and canned fruits and vegetables. University of California)

Some canned products actually contribute more health promoting antioxidants than their fresh counterparts.

- An Oregon Health Sciences University study demonstrated increased amounts of some key anthocyanins, a powerful antioxidant, in canned blueberries, compared to the amounts in fresh and frozen blueberries. (Hatton, D. 2004. The Effect of Commercial Canning on the Flavonoid Content of Blueberries. Oregon Health Sciences University)
- In addition, canned tomatoes and tomato sauces are among the best sources of lycopene. According to the USDA, one-half cup of canned tomatoes provides 11.8 milligrams of lycopene compared to just 3.7 milligrams found in one medium fresh, uncooked tomato. Mild heat treatment of carrots and spinach, as used in commercial canning, enhances the bioavailability of carotene, which is converted to vitamin A in the body. The absorption of lutein in corn, an antioxidant that may reduce the risks of cataracts and macular degeneration, also is enhanced by heat from the canning process, according to research from Cornell University. Canned pumpkin is loaded with beta carotene, a substance from plants that converts to vitamin A and is said to protect against certain types of cancer and heart disease. Canned pumpkin contains a higher concentration of beta carotene than fresh pumpkin because of the canning process. (U.S. Department of Agriculture, Agricultural Research Service. 2005. USDA National Nutrient Database for Standard Reference, Release 18. Nutrient Data Laboratory Home Page, http://www.ars.usda.gov/ba/bhnrc/ndl; Dewanto, V., X. Wu, and R.H. Liu. 2002. Processed sweet corn has higher antioxidant activity. Cornell University)
- **Canned fruits make a significant contribution to key nutrients.** Canned fruits such as pineapple and peaches can make significant contributions to the RDA for vitamin C. (U.S. Department of Agriculture, Agricultural Research Service. 2005. USDA National Nutrient Database for Standard Reference, Release 18. Nutrient Data Laboratory Home Page, http://www.ars.usda.gov/ba/bhnrc/ndl)

Fiber is unchanged regardless of fruit or vegetable form. In general, the USDA database shows that fresh, frozen and canned fruits and vegetables contained similar amounts of fiber. Overall, canned fruits and vegetables were never consistently lower than cooked fresh or frozen products for *any* nutrient. (U.S. Department of Agriculture, Agricultural Research Service. 2005. USDA National Nutrient Database for Standard Reference, Release 18. Nutrient Data Laboratory Home Page, http://www.ars.usda.gov/ba/bhnrc/ndl)

Canned fruits and vegetables do not contribute significantly to American's sugar and sodium intake. In fact, all canned fruits and fruit juices contribute less than two percent of added sugars in most American's diets and vegetables contribute less than one percent of sodium. (JADA: Guthrie, J. and Morton, J: Food sources of added sweeteners in the diets of Americans, vol. 100, no. 1, 2000; JADA, Cotton, P. et al: Dietary sources of nutrients among US adults, 1994 to 1996, vol. 104, no. 6, 2004)

Canned fruits and vegetables are safe. In a review of nearly 4,500 foodborne-related outbreaks and over 138,500 cases of illness, commercially produced canned fruits and vegetables did not directly account for a *single* foodborne outbreak. (The produce category alone was linked to the largest number of foodborne illnesses associated with outbreaks – over 28,000 cases of illness.) (Center for Science in the Public Interest *Outbreak Alert: Closing the Gaps in Our Federal Food-Safety Net*, Nov. 2005.) The metal food can is one of the safest types of food packaging – it is tamper resistant, provides an airtight seal, is thermally sterilized and shelf stable. (FDA's Center for Food Safety and Applied Nutrition, Centers for Disease Control and Prevention, Moffett Center – National Center for Food and Safety Technology, FDA, *Journal of Food Protection*, *International Journal of Food Microbiology*, *International Journal of Food Science and Technology*, U.S. Department of Health and Human Services, United States Department of Agriculture (US DHHS/USDA), Iowa State University Extension, *USA Today*, *Food Chemical News*, *Chicago Daily Herald*, Canadian Food Inspection Agency, Packaging Glossary, Food Product Design, National Institute for Health and USDA Food Safety and Inspection Service.

Canned fruits and vegetables are affordable. The USDA Economic Research Service July 2004 report (How Much Do Americans Pay for Fruits and Vegetables? Agriculture Information Bulletin Number 790) concluded that: "...whether fresh, frozen, or canned, all 85 of the vegetables we priced were less than a dollar per serving, only three cost more than 75 cents a serving, and more than half were less than a quarter." (U.S. Department of Agriculture, Economic Research Service report: How Much Do Americans Pay for Fruits and Vegetables? Agriculture Information Bulletin Number 790, http://www.ers.usda.gov/publications/aib790/aib790.pdf)

For more information, contact Rich Tavoletti, executive director of the Canned Food Alliance, at 412-922-2772 or via e-mail at rctsri@aol.com

Kraft Foods

I-142

November 6, 2006

Patricia N. Daniels
Director, Supplemental Food Programs Division
Food and Nutrition Service
U.S. Department of Agriculture
3101 Park Center Drive
Room 528
Alexandria, VA 22302

Re: Docket ID Number 0584-AD77
WIC Food Packages Rule

Dear Ms. Daniels:

Kraft Foods Global Inc. (Kraft) is pleased to submit these comments on the Food and Nutrition Service's (FNS or the agency) proposed rule to revise the WIC food packages. Kraft is a $34 billion company, the largest food manufacturer in North America, and the second largest worldwide. For over 100 years, Americans have trusted the well-known brands Kraft sells. Today Kraft brands are found in more than 99% of all U.S. households and in over 155 countries worldwide.

Kraft's interest in FNS's proposed rule is substantial given the important role Kraft products play in the WIC program. WIC participants have enjoyed our POST ready-to-eat breakfast cereals, CREAM of WHEAT farina, and KRAFT, POLLY-O, and CRACKER BARREL cheese for many years. In fact, we estimate that participants receive over 27 million pounds of Kraft cereals and 11million pounds of Kraft cheese through the WIC program every year.

INTRODUCTION

Kraft fully supports revising the WIC food packages to better reflect the 2005 *Dietary Guidelines for Americans* (Dietary Guidelines), provide participants with a wider variety of foods, and better serve cultural preferences. Much has changed since FNS established the contents of the current WIC food packages in 1980. We agree that a serious review of the packages is needed, and we appreciate the time and resources FNS has devoted to the task.

We also appreciate the agency's interest in identifying changes to the WIC food package that will maximize nutritional value without substantially increasing program costs. We recognize that difficult choices are necessary, particularly if program funds remain static.

Nonetheless, we urge the agency to critically review some of its proposed choices. We believe there are opportunities for refinement that would better balance the nutritional goals of the program with the agency's interest in meeting the diverse and changing needs of the WIC population. Our specific suggestions follow.

I. REVISE THE WHOLE GRAIN CONTENT CRITERION FOR READY-TO-EAT CEREAL AND BREAD

A. Nutrition Science Supports an 8 g Whole Grain Per Serving Standard

We welcome changes to the WIC food packages that would increase participants' intake of whole grains. Leading nutrition authorities, including the science-based Dietary Guidelines, consistently recommend that Americans incorporate more whole grains into their diet. Kraft is committed to helping consumers meet that goal. We produce a number of 100% whole grain foods, including TRISCUIT crackers and SHREDDED WHEAT cereals. We have also reformulated many existing products and developed others to give consumers additional sources of whole grain. For example, last year we introduced several cookie and snack products that are "Baked with 100% Whole Grain." Of course, our POST cereal portfolio, including the very popular HONEY BUNCHES OF OATS brand, has been a source of whole grain in WIC for many years.

Although we fully support a greater role for whole grains, we urge the agency to reevaluate the 51% whole grain by weight eligibility criterion it proposes for cereals and bread. The criterion comes from the requirements a food must satisfy to bear the "moderate fat" whole grain health claim. As the authors of the FDAMA notification that led to FDA's acceptance of that health claim, we are very familiar with the requirements.[1] In preparing the notification, we concluded that a 51% whole grain by weight standard was appropriate in light of the science linking whole grain with reduced risk of chronic disease and the very compelling label claim qualifying products would bear (i.e., explicitly linking consumption of the foods with reduced risk of heart disease).

Applying that same stringent standard to WIC or to any other food assistance program seems to us inappropriate and detrimental. The WIC food packages are intended to give participants additional help in meeting dietary recommendations, not to provide foods that are so high in particular substances they are associated with reduced risk of chronic disease.[2] With that proper goal in mind, the WIC food packages can help participants meet the Dietary Guidelines' recommendation to "make half your grains whole" (a recommendation that, for most adults means 3 ounce-equivalents per day and, for children ages 1-5, 2 ounce-equivalents per day) by including several types of familiar, well-accepted foods that provide a nutritionally meaningful amount of whole grain.

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1 *See* http://www.cfsan.fda.gov/~dms/flgrain2.html

2 The Child Nutrition Act defines the "supplemental foods" provided by WIC as "those foods containing nutrients determined by nutritional research to be lacking in the diets of pregnant, breastfeeding, and postpartum women, infants, and children and foods that promote the health of [that] population." 42 U.S.C. Section 1786(b)(14).

For the WIC program, we believe a nutritionally meaningful amount is 8 g per serving. Drawing on USDA's oft-repeated statement that a serving of grain contains 16 g of flour, we translate the Dietary Guidelines' recommendation of 3 ounce-equivalents per day into quantitative terms. Thus, a serving (or "ounce-equivalent") of whole grain food contains at least 16 g of whole grain, making the daily minimum recommended amount of whole grain 48 g. Applying that yardstick, 8 g is the quantitative equivalent of a ½ serving of whole grain.[3] We strongly urge the agency to apply this criterion, rather than the 51% by weight criterion it proposes, to ready-to-eat cereal and whole grain bread.[4]

A sample daily menu illustrates the substantial impact an 8 g per serving requirement would have in helping WIC participants consume recommended amounts of whole grain. A child who eats a WIC cereal with 8 g whole grain per serving for breakfast and a sandwich on bread containing 16 g whole grain (8 g per 1 slice serving) for lunch would consume 1.5 of the recommended 2 ounce-equivalents of whole grain before dinner. The same menu would provide a WIC-participating mother with half of her daily whole grain goal. Participants could easily consume the balance of the daily-recommended amount at dinner or through snack occasions.

The fact that participants would need to look to food sources outside the WIC food packages to meet some portion of daily whole grain recommendations seems, to us, perfectly consistent with the parameters of the program. As the agency often notes, WIC is supplemental in nature. It is not intended to provide participants with a nutritionally complete diet. The agency cites this rationale to support a proposed dairy allotment that provides less than the 3 cups per day of low fat dairy products recommended by the Dietary Guidelines. Surely the same reasoning would apply to whole grains.

B. The Detrimental Effects of a 51% Whole Grain by Weight Criterion

The stringent 51% whole grain by weight criterion the agency proposes would limit the cereals, breads, and other whole grain-containing foods in the WIC packages to a small number of products that contain a very high concentration of whole grain. Neither the agency nor IOM suggests that such concentration offers any incremental nutritional advantage. Smaller quantities of whole grain, spread out over several eating occasions during the course of the day,

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[3] Certainly we are not alone in recognizing the nutritional significance of 8 g whole grain per serving. In its Interim Policy Guidance on Whole Grain Claims for meat and poultry products, USDA's Food Safety and Inspection Service states that in determining whether statements about the whole grain content of particular food components that contain both refined and whole grain are appropriate, "[a] significant amount of whole grain would be at least a one-half ounce equivalent of whole grain ingredient, i.e., at least 8 grams of dry whole grain ingredient, per labeled serving and per reference amount customarily consumed." *See* http://www.fsis.usda.gov/OPPDE/larc/Claims/Food_Guide_MYPyramid_Policy.pdf. *See also* http://www.wholegrainscouncil.org/WholeGrainStamp.html.

[4] Like compliance with a 51% whole grain by weight standard, compliance with an 8 g whole grain per serving requirement could be evaluated using fiber as a marker. Because the fiber content of whole grains varies by type, we suggest that the agency use the fiber values for various whole grain sources specified by General Mills in its May 10, 2004 petition to FDA requesting that the agency define the terms "good source" and "excellent source of whole grain." *See* http://www.fda.gov/ohrms/dockets/dockets/04p0223/04p-0223-cp00001-toc.htm. Thus, for example, a cereal that purports to contain 8 g per serving of whole grain from oats would be expected to contain at least 8 g x (10.6/100g) = 0.85 g fiber per serving.

should be as effective in meeting nutritional goals as fewer, more highly concentrated servings, provided recommended limitations on calorie intake are not exceeded.

Moreover, our experience developing products for consumers suggests that a more modest standard for whole grain content would be more likely to actually increase whole grain intake. The reason is simple – consumers are still adjusting to whole grains. They are unfamiliar with many whole grain foods and reject others because they find the taste and mouth feel less acceptable than their refined grain counterparts. Thus, if the 51% whole grain by weight standard is finalized, we expect many participants will spurn the qualifying products. They will avoid unfamiliar foods (e.g., bulgur, whole grain barley) and reject familiar ones such as bread and ready-to-eat cereal in which the whole grain level has been increased dramatically to satisfy the 51% standard.

The detrimental impact of a stringent 51% by weight standard would be particularly pronounced in the ready-to-eat cereal category. A 51% by weight requirement would immediately eliminate half the branded and private label cereals in the program. These include several very popular products that contain 8 g of whole grain or more per serving, namely HONEY BUNCHES OF OATS (Honey Roasted and Almond), KIX, CORN CHEX, RICE CHEX AND WHEAT CHEX.[5] Our product development experience suggests many WIC participants may simply forego cereal entirely rather than switch to the highly concentrated whole grain offerings that remain. Children seem particularly likely to resist the unfamiliar taste and mouth feel of cereals highly concentrated in whole grain.

The 8 g whole grain per serving alternative we suggest would mitigate these effects substantially. It would allow many very popular, well-accepted products that already contain a nutritionally meaningful amount of whole grain to remain in the program, ensuring that the contribution they make to whole grain intake is not lost. An 8 g per serving standard would also increase the likelihood that WIC consumers would accept reformulated versions of popular cereals now made entirely of refined grain. As we noted earlier, consumers' palates are adjusting to whole grain; thus, smaller, less dramatic increases in whole grain content are more likely to be accepted in familiar products.

Cost considerations only underscore the advantages of an 8 g per serving criterion in the ready-to-eat cereal category. We carefully reviewed AC Nielsen retail sales data for the year ending August 26, 2006. Although we agree with the agency that a 51% whole grain by weight criterion offers no meaningful cost savings over currently eligible products, the same is not true of an 8 g per serving standard. Relative to currently eligible ready-to-eat cereals, restricting ready-to-eat cereals to those containing at least 8 g whole grain per serving would lower the average price of qualifying cereal from $.189 to $.185 (rounding all values down to three decimals) per ounce -- a cost savings that amounts to $.144 for a 36-ounce monthly cereal allotment.

Multiplied by the number of WIC participants projected to receive cereal-containing packages (i.e., Packages IV through VII) in FY 2007 alone, the cost savings could be

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[5] The attached chart summarizes the impact a 51% whole grain by weight requirement would have on the eligibility of some of the most popular branded WIC cereals.

significant. Assuming (as does IOM) that participants will continue to receive 90% of total WIC cereal in ready-to-eat form, a $.144 savings per 36 ounces of cereal could save the program over $9 million per year in current dollars.[6]

II. EXEMPT HOT CEREAL FROM ANY WHOLE GRAIN CONTENT CRITERION

We also urge the agency to reconsider how it treats hot cereal in the proposed rule. Although we support enhancing the whole grain content of the WIC food packages as a whole, the hot cereal category requires special consideration. The unique nature of the category defines our position. Currently, WIC-eligible hot cereals consist of three basic foods – oatmeal, grits, and wheat farina. Wheat farina and grits are by definition refined grains.[7] Thus, any whole grain content criterion for hot cereal would effectively shrink the category from three foods to one – an outcome that is flatly inconsistent with the agency's avowed goal of offering WIC participants greater variety and choice in the food packages.[8]

The purported benefit of so severely restricting variety and choice comes at a particularly high price. Although indisputably not a source of whole grain, wheat farina and grits are popular, well-accepted refined grains with significant nutritional value. In addition to being fat, sugar and cholesterol free, both are typically fortified with folic acid, a priority nutrient according to IOM, as well as other vitamins and minerals.[9]

Wheat farina and grits also offer significant advantages in terms of acceptability and cost. Wheat farina is particularly popular and well accepted in Hispanic households, the largest single ethnic group in the WIC population.[10] The leading brand of WIC-eligible instant oatmeal costs over three times as much per labeled serving than Cream of Wheat, the leading brand of wheat farina.[11] Even if new hot cereals formulated to meet the whole grain content

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[6] USDA data forecast that 6,278,129 participants will receive Packages IV through VII in FY 2007. Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Revisions in the WIC Food Packages, Proposed Rule, 71 Fed. Reg. 44784, 44854 Table E (Aug. 7, 2006). As noted, we discounted our projections by the proportion of hot cereal to total cereal, as well as by USDA data on prescription rates for cereal. *See* 71 Fed. Reg. at 44844.

[7] *See* 21 C.F.R. Section 305 (standard of identity for farina). Corn grits is no longer the subject of an FDA standard of identity. However, the longstanding, now revoked standard governing grits defined the product as refined and that practice continues today.

[8] The criterion would exclude 7 of the top 10 currently eligible branded items, namely Nabisco Cream of Wheat, Quaker Oats Grits, Malt-o-Meal Hot Wheat Cereal, Farina Hot Wheat Cereal, Jim Dandy Quick Grits, CoCo Wheats, and Maltex Hot Wheat Cereal. In fact, we estimate a whole grain criterion would effectively eliminate <u>all</u> hot cereals for participants in those states (approximately 26) that do not currently include oatmeal on their WIC cereal cards.

[9] In fact, federal regulations *require* fortification of enriched farina with folic acid. *See* 21 C.F.R. section 137.305. For your convenience, we attach the Nutrition Facts Panels for our four WIC-eligible Cream of Wheat farina varieties.

[10] According to ACNielsen, CREAM OF WHEAT, the leading wheat farina brand, over-indexes among Hispanic households by 138%. ACNielsen HOME*SCAN 2/22/04 & 2/19/05. In contrast, QUAKER, the leading brand of oatmeal, significantly under-indexes among Hispanics. ACNielsen HOME*SCAN, Spectra HispanIQ 06B/Simmons General Market Survey 2004.

[11] ACNielsen SCANTRACK®, 3 Outlet, 52 weeks ending 6/25/05.

criterion emerge, we doubt they would be able to match the low cost of wheat farina and grits to the program.

As discussed earlier, we support the agency's goal of increasing the whole grain content of the WIC package. Refined grains like wheat farina and grits, however, have an important role to play in meeting the nutritional needs of WIC participants. The Dietary Guidelines explicitly recognize the continued importance of grains like farina and grits that are typically enriched with folic acid. Key recommendations in the Guidelines urge Americans to "Consume 3 or more ounce-equivalents of whole grain products per day, with the rest of the recommended grains coming from enriched or whole-grain products."[12] For women who are pregnant or may become pregnant, the advice is even clearer: "Consume adequate synthetic folic acid daily (from fortified foods or supplements) in addition to food forms of folate from a varied diet."[13] We urge the agency to recognize the special value of wheat farina and grits to the program and ensure that they remain in it. Simply put, imposing a whole grain content criterion on hot cereals would decimate the category.

III. SAFEGUARD CALCIUM INTAKE BY PERMITTING PARTICIPANTS TO EXCHANGE FLUID MILK FOR UP TO TWO POUNDS OF CHEESE PER MONTH

The agency proposes to reduce the amount of cheese WIC participants may receive in lieu of milk. Participants receiving Packages IV, V and VI could trade milk for no more than one pound of cheese per month (at a rate of 3 quarts per pound), and participants receiving Package VII could trade for no more than two pounds of cheese.

Again, we think the agency's proposal can be refined to better serve the interests of WIC participants. Specifically, we urge the agency to revise the proposal to allow all participants to trade fluid milk for up to two pounds of cheese per month. This approach would give participants more flexibility and choice in consuming adequate amounts of calcium and in meeting the Dietary Guidelines' recommendations for dairy consumption generally. It would also give lactose intolerant individuals who find it difficult to drink milk an important alternative calcium source.

A. Cheese is An Important, Highly Functional Source of Calcium

Calcium is a critical nutrient for women and children, and the IOM Report identifies calcium as a "highest priority" nutrient for pregnant, lactating, and non-breastfeeding post-partum women.[14] IOM's analysis shows a mean calcium intake of 956 mg per day for pregnant and breastfeeding women and only 668 mg per day for non-breastfeeding women – substantially below adequate intake levels (1300 mg/day for women ages 14 to 18; and 1000

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12 2005 Dietary Guidelines at 35.

13 2005 Dietary Guidelines at 9.

14 71 Fed. Reg. at 44788. Institute of Medicine, WIC Food Packages: Time for a Change 72 (2006) (IOM Report).

mg/day for women ages 19 to 44).[15] Non-breastfeeding women comprise 31% of women participating in WIC.

The health effects of inadequate calcium intake are well known. As the agency acknowledges in the proposal, "insufficient calcium intake for pregnant and breastfeeding women may be associated with potential lead toxicity for the fetus and infant."[16] All women who are calcium insufficient may be at increased risk for osteoporosis, high blood pressure, and certain cancers.[17] Adequate calcium is very important for children as well. The American Academy of Pediatrics stresses the importance of calcium rich foods, including cheese, during childhood and adolescence to help build strong bones and reduce the risk of fractures later in life.[18] Thus, it is critical that the revised food packages provide participants with a sufficient variety of calcium sources to ensure that calcium needs are met.

Cheese represents an important calcium option. On average, an ounce and a half of cheddar and Swiss cheese (a serving of dairy under the Dietary Guidelines) provides 307 mg and 336 mg of calcium, respectively.[19] In fact, many WIC-eligible Kraft cheeses are fortified with calcium. These fortified products typically provide 60% of the Daily Value (600 mg) in one and a half ounces – well above the calcium content of an 8 ounce glass of milk.

Cheese also provides a meaningful amount of vitamin D, which is critical for calcium absorption.[20] Indeed, many WIC-eligible cheese products are fortified with vitamin D, including KRAFT pasteurized process cheese slices that deliver over 20% of the Daily Value (90 IUs) in one and a half ounces. IOM identifies vitamin D as something that should be increased for women participating in the program, noting that "[r]ecent evidence suggests that vitamin D deficiency may be re-emerging as a health concern."[21]

It is important to note that changes to the WIC food packages that reduce cheese and other available sources of vitamin D would have a disproportionate impact on people of color,

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15 IOM Report at 353.

16 71 Fed. Reg. at 44788. Adequate calcium reduces lead absorption and the risk of lead poisoning in both adults and children. Environmental Protection Agency, Press Release, October 22, 2002. *See also* EPA Brochure, "Protecting Your Children Against Lead Poisoning," October 2000. *See also* IOM Report at 62.

17 *See* Wilma Wooten & Winston Price, The Role of Dairy and Dairy Nutrients in the Diet of African Americans, 96 Journal of the National Medical Association 1S, 14S (2004).

18 American Academy of Pediatrics, Optimizing Bone Health and Calcium Intakes of Infants, Children and Adolescents, Pediatrics 2006; 117 (2); 578–585.

19 Melvin B. Heyman, Lactose Intolerance in Infants, Children, and Adolescents, 118 Pediatrics 1279,1282 (2006); USDA Nutrient Database for Standard Reference, Release 19.

20 *See* Wilma Wooten & Winston Price, The Role of Dairy and Dairy Nutrients in the Diet of African Americans, 96 Journal of the National Medical Association 1S, 14S (2004).

21 IOM Report at 62.

who comprise 20% of WIC participants.[22] Individuals with darker skin tones do not produce as much Vitamin D from natural sunlight and, thus, require more from food sources to ensure adequacy. As people of color are also disproportionately lactose intolerant and, thus, often avoid fluid milk, cheese is an ideal vehicle for ensuring vitamin D sufficiency in that population.

The value of cheese as a source of calcium in WIC is enhanced by its exceptional familiarity, acceptance and functionality. IOM established several criteria for including foods in the revised food packages. According to the Institute, "foods in the package [should be] readily acceptable, widely available, and commonly consumed; take into account cultural preferences; and provide incentives for families to participate in the WIC program."[23] Cheese is well accepted in the diets of various ethnic groups, particularly those comprising the greatest number of participants in the WIC program, and thus helps the agency meet its goal of "accommodate[ing] participants with cultural food preferences."[24] Cheese is also widely available and commonly consumed.

It is also convenient and functional. Cheese is easily portable and lasts longer than fluid milk, important characteristics in a program where many participants receive their monthly allotment of food on a single occasion. Cheese is also compact and easy to store, something that is particularly important in households that include more than one WIC participant and that receive multiple gallon and ½ gallon containers of milk at one time. It also can be used in a variety of contexts and foods, including as a snack, in recipes and salads, and as a sauce or topping to improve the palatability of many foods, including fruits and vegetables. All of these features make cheese a food that is particularly "suitable for low income persons who may have limited transportation, storage, and cooking facilities." [25]/ In short, cheese delivers important "high priority" nutrients in a very functional way.

B. The Cheese Category Includes Many Nutritionally Improved Products that Can Help Address Reservations about the Overall Nutrient Profile of Cheese

We recognize that IOM recommended reducing the amount of cheese in the WIC food packages at least in part because of concerns about its saturated fat, total fat, and cholesterol content.[26] To us, the many benefits of cheese for the WIC population, discussed earlier, outweigh these concerns. Moreover, it is difficult to predict with confidence whether limiting

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22 71 Fed. Reg. at 44825.

23 IOM Report at 37.

24 71 Fed. Reg. at 44784. FNS survey data validate the acceptability of cheese to WIC participants. According to the agency's national survey of WIC participants, 80.9% of participants were very satisfied and another 13.7% were fairly satisfied with the amount of cheese they receive through the program. Food and Nutrition Service, United States Department of Agriculture, National Survey of WIC Participants Report No. WIC-01-NSWP (October 2001).

25 IOM Report at 37.

26 IOM Report at 108.

the amount of these nutrients of concern in WIC foods will have an effect on total consumption, as dietary choices made outside the WIC program may offset reductions in consumption through WIC.

Nonetheless, if the agency views those concerns as an impediment to increasing the limit on cheese to two pounds per month, we respectfully suggest modifying the proposed rule to enhance the role of reduced fat and other nutritionally improved cheeses in the packages. For example, the agency might cap full fat cheese at one pound per month but allow participants to trade milk for an additional pound of WIC-eligible cheese that is reduced in fat, saturated fat or cholesterol.

A wide variety of nutritionally improved cheeses are already available in the market today. A list of Kraft's reduced fat WIC-eligible cheeses is attached. The list includes reduced fat cheddar, mozzarella, Monterey Jack, and Colby in block and shredded forms, 2% pasteurized processed American slices, and fat free cheddar and mozzarella. The chart below summarizes the fat and saturated fat content of these products relative to the "regular" versions of cheddar, mozzarella, Colby and pasteurized processed American cheese.[27]

Cheese	Total Fat (per ounce)		Saturated Fat (per ounce)	
	Regular	Nutritionally Improved	Regular	Nutritionally Improved
Cheddar	9.4g	0 – 6g	5.98g	0 – 3.5g
Mozzarella	6.34g	0 – 4g	3.729g	0 – 2.5g
Colby	9.10g	6g	5.732g	3.5g
2% Pasteurized Processed Cheese/American	8.86g	6g	5.583g	3.5g

These products illustrate the viability of limiting some portion of participants' cheese allotment to nutritionally improved products. A limitation of this kind would allow the agency to recognize the value of cheese as a highly functional source of important dairy nutrients (particularly for lactose intolerant individuals) while, at the same time, taking steps to reduce nutrients of concern in the packages.

C. Cheese Helps Fulfill the Special Dietary Needs of Lactose Intolerant Individuals

In addition to providing important nutrients in a convenient, familiar and nutritionally sensible way, cheese is well tolerated by lactose intolerant individuals -- an important consideration given that close to 60% of WIC participants are from ethnic groups with high rates of lactose intolerance.[28] Primary lactase deficiency is prevalent in 50-80% of Hispanics

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[27] Values for regular, full fat cheeses taken from USDA Nutrient Database for Standard Reference, Release 19.

[28] L.K. Mahan, et al., Krause's Food, Nutrition & Diet Therapy 720 (11th ed. 2004) ("Most lactose maldigesters can consume some lactose without major symptoms, especially when taken with meals or in the form

and 60-80% of African Americans.[29] In fact, both the IOM report and the agency's proposed rule notes the high rates of lactose intolerance among African-American women, a group which is "represented in the WIC population at a level disproportionate to their share of the general population."[30]

Yet despite lactose intolerance, many WIC participants can consume dairy, and thus obtain more calcium, by eating hard cheeses.[31] Reduced fat milk has 285 mg of calcium and 12.2 g of lactose in one cup; as noted earlier, 1.5 ounces of cheddar and Swiss cheese (the equivalent of one cup of milk under the Dietary Guidelines) provides 307 mg and 336 mg of calcium but only 0.09 g and 0.02 g of lactose, respectively.[32] Thus, cheese provides an important alternative to fluid milk for those who cannot tolerate milk's much higher lactose content.

And those alternatives are very important from a nutritional standpoint. Medical professionals stress the continued importance of dairy for lactose intolerant individuals. For example, the National Medical Association recommends 3 to 4 servings a day of lactose free milk, cheese, and/or yogurt for African Americans to help reduce the risk of hypertension and diabetes.[33] The American Academy of Pediatrics in a very recent review concludes that yogurt, cheese and pre-treated milks are important alternatives to milk in treating lactose intolerance because avoidance of dairy may lead to inadequate intake and suboptimal bone mineralization in lactose intolerant children.[34]

We note that the agency proposes to allow participants who are lactose intolerant to obtain more than one pound of cheese per month, but participants would have to obtain and submit medical documentation of their intolerance. In our view, this time-consuming hurdle will only discourage lactose intolerant participants from consuming dairy products of any kind, jeopardizing their ability to meet Dietary Guidelines recommendations for dairy intake and the critical nutrients dairy foods provide.

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of cheeses or cultured dairy products.") *See* 71 Fed. Reg. at 44825 (stating that 20% of participants are African-American and 39% of participants are Hispanic).

29 Melvin B. Heyman, Lactose Intolerance in Infants, Children, and Adolescents, 118 Pediatrics 1279,1280 (2006).

30 71 Fed. Reg. at 44847.

31 *See* Wilma Wooten & Winston Price, The Role of Dairy and Dairy Nutrients in the Diet of African Americans, 96 Journal of the National Medical Association 1S, 6S (2004).

32 Melvin B. Heyman, Lactose Intolerance in Infants, Children, and Adolescents, 118 Pediatrics 1279,1282 (2006). Calculations regarding the amount of calcium and lactose per 1.5 ounces of cheddar and Swiss cheese computed using USDA Standard Reference, Release 19.

33 *See* Wooten & Price at 5S-31S.

34 *See* Heyman, Lactose Intolerance in Infants, Children and Adolescents.

The availability of soy and tofu in the packages would not alleviate that concern. Although soy is a source of calcium, it is not widely used or accepted by the majority of WIC participants. Cheese is. According to the agency's proposed rule, "market consumption data indicate that about 3% of U.S. households with WIC-eligible incomes purchased tofu."[35] Similarly, the agency "anticipates that 10% of women will request soy beverage in place of liquid milk." Moreover, the proposal would allow children ages 1 to 5 to obtain soy and tofu as substitutes for milk but only with proper medical documentation.

Thus, cheese will continue to represent an important and very practical alternative to fluid milk for a substantial portion of the WIC population. Our suggestion for a more modest restriction on the amount of cheese participants may obtain for milk without medical documentation – two pounds per month, one of which could be limited to nutritionally improved cheese products – is fully in line with that reality.

D. Raising the Cap on Cheese Substitution Need Not Jeopardize the Proposal's Cost Neutrality

Certainly modifying the agency's proposal to increase the amount of cheese participants could receive in lieu of milk would add costs to the program that are not accounted for in the agency's economic analysis. Those costs may not be quite as substantial as they initially appear, however. Moreover, there is at least one potentially sizable cost offset that, in our judgment, warrants a careful second look.

With respect to the incremental costs of raising the cheese cap, we agree that cheese represents a cost premium to milk. The agency's economic analysis may overstate that premium, however. Specifically, FNS assigns a price of $0.675 to a quart of milk and $3.557 to a pound of cheese. At a substitution rate of 3 quarts milk per pound of cheese, cheese would cost the program $1.532 more than an equivalent amount of milk. We question the accuracy of the $0.675 quart price, however. Many, many WIC participants receive their milk in ½ gallon containers. AC Nielsen data indicate an average price for a ½ gallon of 2% milk of $2.04 for the 4 weeks ending 8/12/06. This is consistent with the average price for the 4 weeks ending 12/31/05. Thus, to us, the real cost of a quart of milk to the program appears closer to, if not slightly over, $1, thereby lowering the cost premium of cheese versus fluid milk from about $1.50 to $0.50 per pound.

With respect to cost offsets, we respectfully suggest that the agency reconsider using cash vouchers to provide fruits and vegetables. We fully endorse adding fruits and vegetables to the packages. They are an essential component of a healthful diet, and their inclusion in WIC is overdue. An open-ended cash voucher, however, strikes us as inconsistent with the way FNS addresses every other type of food in the packages (i.e., with specificity, establishing lists of eligible foods in each category and, in some cases, imposing nutrient minimums and maximums). Likewise, it seems at odds with the agency's own observation that "a rule that allows wide choice among vegetable varieties cannot guarantee delivery of priority nutrients at

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[35] 71 Fed. Reg. at 44840.

recommended levels."[36] This tells us that alternatives to the proposed voucher system deserve careful consideration.

One such alternative might be a variation on the dark green and orange vegetable approach the agency considered but rejected in preparing the proposed rule. We suggest that the agency revisit that approach, in part because it failed to include fruits. To us, an allotment limited to a finite number of frequently purchased fruits and vegetables that are relatively nutrient dense seems more likely to deliver priority nutrients than an open-ended voucher. And because the varieties would be chosen in part based on their popularity, and include fruits as well as vegetables, we think this approach would improve acceptability and give participants adequate variety and choice. We also think it would simplify the logistical and administrative challenges FNS expects vouchers to present for both vendors and state agencies.[37]

Finally, based on the agency's own work on the dark green and orange vegetable alternative, we think a more structured approach to the fruit and vegetable allotment would offer substantial costs savings relative to open-ended vouchers. Those costs savings could be used to offset modifications to other parts of the proposed packages, including raising the cap on cheese substitution.

IV. CHANGES TO THE WIC FOOD PACKAGES SHOULD BE IMPLEMENTED IN A GRADUAL AND DELIBERATE WAY

As noted earlier, we fully support modifying the WIC food packages to keep pace with changes in nutrition science and better serve the WIC population. Because few, if any, modifications have been made to the packages since WIC began, however, the changes proposed now are dramatic. Given this, we strongly urge the agency to proceed in a deliberate manner, taking steps to ensure that the revisions to the packages in fact accomplish the goals of the rulemaking.

Specifically, we suggest that the agency approach implementation of the entire final rule in the same way it proposes to implement the changes to the food package for partially breastfeeding women. Thus, the agency would implement the final rule at a limited number of test sites for a specified period of time. Based on the agency's analysis and assessment of the effects of the food package changes (particularly on the actual intake of priority nutrients) at those test sites, the agency would determine whether and when to move to full implementation of the revised food packages.

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[36] 71 Fed. Reg. at 44849.

[37] As the agency stated: "A restrictive vegetable rule might also reduce the inefficiency costs incurred by retailers as WIC participants mistakenly bring non-WIC items to the checkout counter. A small and definite list of WIC approved vegetables would allow retailers to affix labels to store shelves and point WIC participants to each of their options." 71 Fed. Reg. at 44848. In addition, under the proposed voucher system, state agencies will need to revise their education materials more extensively to provide education and support on fruit and vegetable selection, storage, and preparation. *See* 71 Fed. Reg. at 44846.

We appreciate the opportunity to comment on this important rulemaking and look forward to a continued role for Kraft products in the WIC food packages.

Respectfully submitted,

Richard M. Black
Vice President & Chief Nutrition Officer
Kraft Foods Global, Inc.

KRAFT FOODS
NUTRITION LABEL FORM

PRODUCT NAME NABISCO CEREALS INSTANT CREAM OF WHEAT ORIGINAL

Nutrition Facts

Serving Size 1 packet (28g)
Servings Per Container (UNIT IN 11.75 OZ VARIETY PACK) 2, (12 oz) 12, (UNIT IN 59.79 OZ VARIETY PACK) 20

Amount Per Serving	Cereal	Cereal with 2/3 cup Fat Free Milk
Calories	100	150
Calories from Fat	0	0
		% Daily Value**
Total Fat 0g*	0%	0%
Saturated Fat 0g	0%	0%
Trans Fat 0g		
Polyunsaturated Fat 0g		
Monounsaturated Fat 0g		
Cholesterol 0mg	0%	0%
Sodium 160mg	7%	10%
Potassium 35mg	1%	9%
Total Carbohydrate 19g	6%	9%
Dietary Fiber 1g	4%	4%
Sugars 0g		
Other Carbohydrate 18g		
Protein 3g		
Vitamin A	25%	30%
Vitamin C	0%	0%
Calcium	20%	40%
Iron	45%	45%
Thiamin	25%	30%
Riboflavin	20%	35%
Niacin	25%	25%
Vitamin B_6	25%	30%
Folic Acid	25%	25%

* Amount in Cereal. 2/3 cup fat free milk contributes an additional 50 calories, 85mg sodium, 270mg potassium, 8g total carbohydrate (8g sugars), and 5g protein.

** Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Saturated Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Potassium		3,500mg	3,500mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

PRODUCT NAME NABISCO CEREALS CREAM OF WHEAT
INSTANT (1 MINUTE COOK ON STOVE)

Nutrition Facts

Serving Size 3 tbsp (33g)
Servings Per Container (28 oz) about 24

Amount Per Serving	Dry Cereal	Prepared with 1 cup Fat Free Milk
Calories	120	210
Calories from Fat	0	0
		% Daily Value**
Total Fat 0g*	**0%**	**0%**
Saturated Fat 0g	**0%**	**0%**
Trans Fat 0g		
Cholesterol 0mg	**0%**	**2%**
Sodium 0mg	**0%**	**5%**
Total Carbohydrate 24g	**8%**	**12%**
Dietary Fiber 1g	**4%**	**4%**
Sugars 0g		
Protein 4g		
Vitamin A	0%	10%
Vitamin C	0%	0%
Calcium	20%	50%
Iron	50%	50%
Thiamin	10%	20%
Riboflavin	4%	30%
Niacin	6%	6%
Folic Acid	10%	10%

* Amount in Cereal. One cup fat free milk contributes an additional 90 calories, 130mg sodium, 12g total carbohydrate (12g sugars), and 8g protein.

** Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Saturated Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Potassium		3,500mg	3,500mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

PRODUCT NAME NABISCO CEREALS CREAM OF WHEAT QUICK (2 1/2 MINUTE COOK ON STOVE)

Nutrition Facts

Serving Size 3 tbsp (33g)
Servings Per Container (14 oz) about 12, (28 oz) about 24

Amount Per Serving	Cereal	Prepared with 1 ¼ cup Fat Free Milk
Calories	120	220
Calories from Fat	0	0
		% Daily Value**
Total Fat 0g*	**0%**	**0%**
Saturated Fat 0g	**0%**	**0%**
Trans Fat 0g		
Cholesterol 0mg	**0%**	**2%**
Sodium 85mg	**4%**	**10%**
Total Carbohydrate 23g	**8%**	**13%**
Dietary Fiber 1g	**4%**	**4%**
Sugars 0g		
Protein 4g		
Vitamin A	0%	10%
Vitamin C	0%	0%
Calcium	20%	60%
Iron	50%	50%
Thiamin	10%	20%
Riboflavin	4%	35%
Niacin	6%	6%
Folic Acid	10%	10%

* Amount in Cereal. 1 ¼ cup fat free milk contributes an additional 110 calories, 160mg sodium, 16g total carbohydrate (16g sugars), and 10g protein.

** Percent Daily Values are based on a 2,000 calorie diet Your daily values may be higher or lower depending on your calorie needs:

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Saturated Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Potassium		3,500mg	3,500mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

PRODUCT NAME NABISCO CEREALS CREAM OF WHEAT
REGULAR (10 MINUTE COOK ON STOVE)

Nutrition Facts

Serving Size 3 tbsp (33g)
Servings Per Container (28 oz) about 24

Amount Per Serving	Dry Cereal	Prepared with 1 1/2 cup Fat Free Milk
Calories	120	250
Calories from Fat	0	0
		% Daily Value**
Total Fat 0g*	**0%**	**0%**
Saturated Fat 0g	**0%**	**0%**
Trans Fat 0g		
Cholesterol 0mg	**0%**	**2%**
Sodium 0mg	**0%**	**8%**
Total Carbohydrate 24g	**8%**	**14%**
Dietary Fiber 1g	**4%**	**4%**
Sugars 0g		
Protein 4g		
Vitamin A	0%	15%
Vitamin C	0%	0%
Calcium	20%	70%
Iron	50%	50%
Thiamin	10%	20%
Riboflavin	4%	45%
Niacin	6%	6%
Folic Acid	10%	10%

* Amount in Cereal. 1 1/2 cup fat free milk contributes an additional 130 calories, 200mg sodium, 19g total carbohydrate (19g sugars), and 12g protein.

** Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs.

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Saturated Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Potassium		3,500mg	3,500mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

KRAFT WIC ELIGIBLE
NUTRIONALLY ENHANCED CHEESES

Kraft String Cheeses
Kraft Reduced Fat Mozzarella String Cheese made with 2% Milk
Polly-O Reduced Fat String Cheese Reduced Fat Mozzarella Cheese

Kraft Sliced Cheeses
Kraft Deli Deluxe 2% Pasteurized Processed American Cheese

Kraft Chunk (Block) Cheeses
Kraft Natural Reduced Fat Mild Cheddar Cheese
Kraft Natural Reduced Fat Monterey Jack Cheese
Kraft Natural Reduced Fat Sharp Cheddar Cheese
Kraft Natural Reduced Fat Colby Cheese
Kraft Natural Reduced Fat Longhorn Style Mild Cheddar Cheese

Kraft Shredded Cheeses
Kraft Natural Finely Shredded Reduced Fat Sharp Cheddar made with 2% Milk
Kraft Natural Shredded Non-Fat Cheddar Cheese
Kraft Natural Shredded Non-Fat Mozzarella Cheese
Kraft Natural Shredded Reduced Fat Mild Cheddar Cheese made with 2% Milk
Kraft Natural Shredded Reduced Fat Mozzarella Cheese made with 2% Milk
Kraft Natural Shredded Reduced Fat Sharp Cheddar made with 2% Milk
Kraft Natural Shredded Reduced Fat Colby & Monterey Jack Cheese made with 2% Milk

Kraft Crumbled Cheeses
Kraft Natural Cheese Crumbles Reduced Fat Colby & Monterey Jack Cheeses

Cracker Barrel Chunk (Block) Cheese
Cracker Barrel Sharp Natural Reduced Fat Cheddar Cheese
Cracker Barrel Sharp-White Natural Reduced Fat Cheddar Cheese
Cracker Barrel Extra Sharp-White Natural Reduced Fat Cheddar Cheese
Cracker Barrel Vermont Sharp-White Natural Reduced Fat Cheddar Cheese+A10

USDA Proposed Regulation, August 2006

Manufacturer	Post & Other Top Branded WIC Eligible Cereals	WIC Eligiblity under proposed guidelines	Whole Grain at least 51%	Could provide 8g WG per serving
Post	HBO	⊘	34%	☆
	HBO Almond	⊘	33%	☆
	Banana Nut Crunch	Yes	60%	
	Grape Nuts	Yes	52%	
	Grape Nuts Flakes	Yes	86%	
	Bran Flakes	Yes	57%	
General Mills*	Cheerios	Yes	53%	
	Multi Grain Cheerios	Yes	Assume meets	
	Kix	⊘	27%	☆
	Corn Chex	⊘	36%	☆
	Multi Bran Chex	⊘	23%	☆
	Rice Chex	⊘	28%	☆
	Wheat Chex	Yes	100%	
	Wheaties	Yes	53%	
	Whole Grain Total	Yes	53%	
Kellogg's**	Corn Flakes	⊘	0%	
	Crispix	⊘	0%	
	Frosted Mini Wheats	Yes	74%	
	Special K	⊘	0%	
	Product 19	⊘	12.3%	
Quaker	Life**	Yes	55%	

*Whole grain content assumed after manufacturer reformulation and packaging claims
**Whole grain content assumed around content and packaging claims
Source: Kraft Foods